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July 7, 2020

**VIA ECF
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The Honorable Analisa Torres
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

*Re: Peter Ronningen v. LIVunLtd LLC and Park Hyatt New York
Case No. 20-cv-02554-AT
SCHEDULING*

Dear Judge Torres:

My firm, BakerHostetler, represents Defendant LIVunLtd LLC (“LIV”) in the above-referenced action.

With the consent of counsel for Plaintiff Peter Ronningen (“Plaintiff”) and Defendant Park Hyatt New York (“Park Hyatt”), we respectfully submit this joint request for an adjournment of the initial pretrial conference with the Court set for 11:00 a.m. on August 4, 2020, and related deadlines, as set forth below. This is the parties’ first request for an adjournment of this initial pretrial conference and extension of related deadlines.

On April 1, 2020, the Court issued its Initial Pretrial Conference Order (the “Order”). [Doc. #10] The Order set an initial pretrial conference for 11:00 a.m. on August 4, 2020. In addition, the Order requires the parties to submit a Proposed Civil Case Management Plan and Scheduling Order no later than July 28, 2020.

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Park Hyatt recently executed a waiver of service for Plaintiff's Amended Complaint, making Park Hyatt's response to the Amended Complaint due on August 24, 2020. [Doc. #21] Because Park Hyatt's response deadline is after the currently set initial pretrial conference and deadline to submit the Proposed Civil Case Management Plan and Scheduling Order, the parties respectfully request that the initial pretrial conference be adjourned and rescheduled to a date in mid-to-late September 2020 so that the deadline for the Proposed Civil Case Management Plan and Scheduling Order be due after Park Hyatt's August 24th response deadline.

Thank you and we appreciate the Court's consideration.

Respectfully submitted,



Nathan A. Schacht
Counsel

cc: Matthew Porges, Esq. (Counsel for Plaintiff)
Celena R. Mayo, Esq. (Counsel for Park Hyatt)
Joanna Colacurcio, Esq. (Counsel for Park Hyatt)

GRANTED. The initial pretrial conference scheduled for August 4, 2020 is ADJOURNED to **September 21, 2020, at 10:40 a.m.** By **September 14, 2020**, the parties shall submit their joint letter and proposed case management plan.

SO ORDERED.

Dated: July 8, 2020
New York, New York



ANALISA TORRES
United States District Judge